

TURNER & MCKENZIE, PC
ATTORNEYS AT LAW

- * Randall E. Turner
- ** Thomas W. McKenzie

- * Board Certified in
Personal Injury Trial Law and
Civil Trial Law by the
Texas Board of Legal Specialization
- * Civil Trial Specialist by the
National Board of Legal Specialization
- * Also Licensed in Colorado
- ** Also Licensed in Oklahoma

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June 6, 2011

Via CMrrr: **7009 2250 0003 7625 3908**
First Class Mail
Via Email- mmmariyinla@aol.com
Mary Cummins, Defendant
645 W. 9th St., #110-140a
Los Angeles, California 90015

Re: *Bat World Sanctuary, et al. vs. Mary Cummins*; Cause No: 352-248169-10

Dear Mrs. Cummins:

Enclosed please find Plaintiffs Notice of Intent to Take the Oral Deposition of Defendant May Cummins.

If you have any questions please feel free to contact me.

Sincerely,



Kelly Bozeman
Paralegal to Randall E. Turner
kelly@turnermckenzie.com

CAUSE NO. 352-248169-10

BAT WORLD SANCTUARY and
AMANDA LOLLAR,
Plaintiffs

v.

MARY CUMMINS,
Defendant

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IN THE DISTRICT COURT

TARRANT COUNTY, TEXAS

352nd JUDICIAL DISTRICT

**PLAINITFF'S NOTICE OF INTENT TO TAKE ORAL DEPOSITION OF
DEFENDANT, MARY CUMMINS**

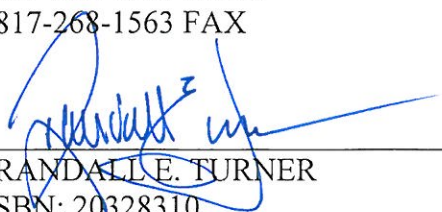
To: Pro Se Defendant, MARY CUMMINS, 645 W. 9th Street, #110-140a
Los Angeles, California 9005.

Please take notice that Plaintiffs, by and through their attorney of record, will take the oral deposition MARY CUMMINS on **Wednesday, June 22, 2011 at 10:00 a.m.** at the Law Office Turner & McKenzie, 1800 Norwood Drive, Suite 100, Hurst, Texas 76054.

Such deposition will continue until concluded to the satisfaction of all parties and may be used in evidence in the above styled and numbered cause. This deposition may be videotaped.

Respectfully submitted,

LAW OFFICE OF TURNER & MCKENZIE
1800 N. Norwood Drive, Suite 100
Hurst, TX 76054
817-282-3868 Phone
817-268-1563 FAX



RANDALL E. TURNER
SBN: 20328310
ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

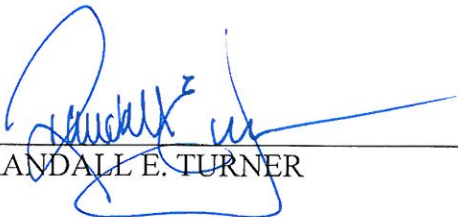
The above deposition was ordered by the court on 6/2/2011. Therefore this deposition shall being taken pursuant to this notice.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served upon the Attorney of record (or Pro Se Defendant) of all parties to the above-entitled and numbered cause in accordance with TEX. R. CIV. P. 21a, on this 02 day of June, 20 11, by the following method:

- personal delivery
- telephonic document transfer (fax)
- certified mail
- courier receipted delivery

Via CMrrr: **7009 2250 0003 7625 3908**
and via Email.
Defendant, Mary Cummins
645 W. 9th St., #110-140a
Los Angeles, California 90015



RANDALL E. TURNER